

National Park Service  
US Department of the Interior

Concession Environmental Management Program  
Denver, Colorado



# Guidance for Conducting Hazard Communication (HAZCOM) Training



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The National Park Service Concession Environmental Management Program does not make any guarantee or assume any liability with respect to the use of information in this guidance. It remains the sole responsibility of concessioners to review, understand and apply the appropriate federal, state and local regulations that govern this topic area. Additional consultation with qualified professionals or federal, state and local environmental agencies may be necessary to ensure a concessioner's program complies with applicable regulations.

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## Purpose of This Guidance

This document explains Hazard Communication (HAZCOM) training requirements for employees, as required by a regulation developed by the Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.1200, titled the Hazard Communication Standard. The guidance includes tools that can assist employers in carrying out HAZCOM training and focuses on issues relevant to concessioners operating in National Parks.

## Who Should Read This Guidance

This guidance was written for NPS concessioners who use or store hazardous chemicals at their facilities. In general, chemicals labeled with the words "CAUTION," "WARNING," "DANGER," "POISON," or the skull and crossbones symbol are hazardous chemicals. These include common products found even in households, such as cleaning products, paints, oils, and pesticides (such as wasp killer spray). This guidance provides information for concessioners on how to **conduct** HAZCOM training. It does not provide information on how to **document** a written HAZCOM Program or implement *other* parts of the HAZCOM Standard (although these issues are very closely interrelated). Information on these topics is found in the section entitled "Additional Information."

## When is HAZCOM Training Needed?

If a concessioner has one or more employees who use hazardous chemicals in the workplace, HAZCOM training must be provided. This training must be provided when an employee is first hired, when new hazardous chemicals are introduced into the workplace, and when the employer's HAZCOM Program changes in any way (e.g., labeling system changes).

A HAZCOM Program (and therefore HAZCOM training) **is not needed** if the **only** hazardous chemicals purchased and used are those that are considered consumer products, and when these products are used in the workplace in the same manner that a consumer would use them, (i.e.; where the duration and frequency of use (and therefore exposure) is not greater than what the typical consumer would experience). However, if this situation exists, it is still a recommended Best Management Practice (BMP) that concessioners develop a HAZCOM Program to ensure worker safety and protection of the environment.



Common office products such as pens, markers, and correction fluid; and cleaners such as Windex and Pledge, are among those hazardous chemicals that may be considered consumer products.

## Understanding the HAZCOM Standard

Before a concessioner can train employees on HAZCOM, the concessioner should understand the HAZCOM Standard (29 CFR 1910.1200) itself and the requirements for employers and employees under the program.

The four main components to the HAZCOM Standard that affect concessioner operations are:

1. **Written HAZCOM Program.** This describes the HAZCOM Program. It should include a list of all hazardous chemicals, and be available to all employees.
2. **Material Safety Data Sheets (MSDSs).** MSDSs should be provided for all hazardous chemicals, and should be readily accessible to all employees at all times.
3. **Labeling system.** Labels are needed for all containers, including hazardous chemicals that are not in their original containers.
4. **Employee training.**

Further information on the HAZCOM Standard and these four components in particular are found in the Assistance Resource entitled *Guidance for Developing a Written Hazard Communication (HAZCOM) Program* (see the “Additional Information” section).

## How Do You Conduct HAZCOM Training?

HAZCOM training may be conducted in a number of ways. Some concessioners may be able to participate in National Park Service (NPS) HAZCOM training. Others may use a video series or employ an outside trainer. Some concessioners may find it most effective to conduct HAZCOM training themselves. Depending upon the size and complexity of the concessioner operation, HAZCOM training may be conducted via a session dedicated solely to HAZCOM, take place during a staff meeting (such as a monthly safety meeting scheduled as part of the Risk Management Program), or integrated into other training (e.g., safety training).

Regardless of how HAZCOM training is carried out, it is important to remember that **training must be job-specific**. Employees should be trained on the particular chemical and physical hazards they encounter in the workplace. These are not always the same. For example, maintenance staff typically work with different hazardous chemicals than kitchen staff, and therefore may be exposed to different physical and health hazards. The same training might not be right for both groups of employees. Concessioners should determine, based on their own circumstances, whether HAZCOM training should be covered in one session for all employees, or whether separate training is required for personnel in order to be effective. One way to deal with this issue is to develop or use a core training piece, such as NPS or video HAZCOM training, and then augment it with on-the-job specific discussions.



Although the HAZCOM Standard does not specify the need for refresher training, it is a recommended Best Management Practice (BMP) to conduct **annual** HAZCOM training for full- and part-time employees.

**Multi-employer Workplaces:** While regulations do not require that a concessioner provide HAZCOM training to contractors, NPS staff, or other employees who have the potential to be exposed to concessioner hazardous chemicals, the following is required. A concessioner must tell employers of other employees who may be exposed to concessioner hazardous chemicals:

- Where they can find material safety data sheets (MSDSs).
- About precautionary measures that should be taken to protect employees when working in facilities managed by the concessioner.
- About the concessioner's hazardous chemical labeling system.



It is a recommended Best Management Practice (BMP) to inform "other" employees (e.g., employees of contractors, the NPS or other business), not just their employers, on these three topics.

## Sample HAZCOM Training Agenda

Listed below are topics that should be discussed in HAZCOM training. This list should be augmented with job-specific topics since the hazards encountered by employees may differ depending on their level of responsibility and assigned work tasks.

- Explanation of the HAZCOM Standard and its purpose.
- Definition of a hazardous chemical.
- List of hazardous chemicals that employees use in the workplace.
- How employees can detect the release of a hazardous chemical (e.g., by sight, smell).
- Personal protective equipment (PPE) and appropriate work practices that employees should use to protect themselves from hazardous chemical exposure (e.g., gloves, goggles, pants, long-sleeved shirts).
- Emergency and first-aid procedures as well as typical symptoms of overexposure to chemicals.
- Labeling system used by concessioners when hazardous chemicals are transferred from original containers into other (i.e., secondary) containers (i.e., write down the name and any hazard information on secondary containers).
- How to interpret material safety data sheets (MSDSs) (i.e., what they are, what information they contain).
- Location of MSDSs (e.g., MSDSs will be located in the Maintenance Office).
- Location of the concessioner's list of hazardous chemicals.
- Location of the concessioner's written HAZCOM Program.

**Appendix A** is a sample handout that a concessioner can distribute to employees while conducting HAZCOM training. However, the concessioner should realize that HAZCOM training does not need to be formal as long as all points of the HAZCOM training agenda (listed above) are adequately covered.

## Documenting Completed HAZCOM Training



While not required by OSHA, it is a recommended BMP for concessioners to document their HAZCOM training. Information on the type of training, when it was conducted, and who attended should be recorded. If an OSHA inspector was to visit concessioner facilities or operations, this document would provide proof to the inspector that employees had received HAZCOM training. **Appendix B** is a sample attendance sheet that concessioners can use to document HAZCOM training. **Appendix C** is a sample document that concessioners can use to document an individual employee's HAZCOM training and put into personnel files.

## Integrating HAZCOM and Other Environmental Training

HAZCOM training provides an opportunity to discuss other related environmental, health, and safety topics that may have their own training requirements. Topics such as emergency response to hazardous substance spills, respiratory protection, and confined space entry are all concerned with chemical and physical hazards in the workplace.

Concessioners can schedule one training session to cover a variety of related environmental, health, and safety topics rather than carrying out individual training classes for each subject. However, if this approach is used, concessioners should ensure that all required topics for each training requirement are completely and effectively addressed in the training session. Concessioners should also document what each employee was trained on during the training session.

## Additional Information

Resource Type	Name	Description	Source
document	Hazard Communication – A Compliance Kit	Comprehensive guide that assists employers in complying with the HAZCOM Standard; guide also includes a sample training program	Contact the US Government Printing Office at 202/512-1800 to order it for \$20; or contact the NPS Concession Environmental Management Program <i>GreenLine</i> Technical Assistance Number at 303/987-6913 to obtain a photocopy.
website	Technical Links – Hazard Communication	Website that has links to Frequently Asked Questions, fact sheets, and information on labeling, MSDSs, training, and HAZCOM Standard compliance	OSHA <a href="http://www.osha.gov/SLTC/hazardcommunications/index.html">www.osha.gov/SLTC/hazardcommunications/index.html</a>

<b>Resource Type</b>	<b>Name</b>	<b>Description</b>	<b>Source</b>
document	Guidance for Developing a Written Hazard Communication Program	Guidance written specifically for concessioners on documenting a written HAZCOM Program, as required by the HAZCOM Standard	NPS Concession Environmental Management Program <i>GreenLine</i> Technical Assistance Number 303/987-6913
phone number	OSHA HelpLine	Provides regulatory assistance	OSHA 301/515-6796
website	OSHA Office Directory	Provides contact information for federal and state OSHA offices	OSHA <a href="http://osha.gov/html/oshdir.html">osha.gov/html/oshdir.html</a>
document	EnviroCheck Sheet: Hazard Communication	Multi-page document used as a tool during NPS environmental audits	NPS Concession Environmental Management Program <i>GreenLine</i> Technical Assistance Number 303/987-6913





**APPENDIX A**

**SAMPLE HAZCOM TRAINING HANDOUT**

# **Hazard Communication**

- The HAZCOM Standard**
- Definition of a Hazardous Chemical**
- List of Hazardous Chemicals Used**
- How to Detect Hazardous Chemical Releases**
- Personal Protective Equipment**
- Labeling System**
- Material Safety Data Sheets (MSDSs)**
- Hazardous Chemical Inventory**
- Documented HAZCOM Program**

# **HAZCOM Standard (29 CFR 1910.1200)**

## **Purpose**

- To ensure that information concerning hazardous chemicals is transmitted to employers and employees.
- To ensure that requirements for HAZCOM in workplace settings are consistent nationwide.

# Definition of a Hazardous Chemical

- **Physical Hazard.** Any chemical that is:
  - A combustible liquid
  - A compressed gas
  - Explosive
  - Flammable
  - An organic peroxide (chemicals that are usually fire and explosive hazards)
  - An oxidizer
  - Pyrophoric (i.e., chemicals that spontaneously ignite)
  - Unstable (i.e., reactive)
  - Water-reactive
- **Health Hazard.** Any chemical that may produce acute or chronic health effects in exposed employees. Examples are:
  - Carcinogens (i.e., cancer-causing chemicals)
  - Toxic agents
  - Reproductive toxins
  - Irritants
  - Corrosives
  - Sensitizers
  - Hepatotoxins (i.e., liver toxins)
  - Nephrotoxins (i.e., kidney toxins)
  - Neurotoxins (i.e., nerve toxins)
  - Chemicals that damage the ability to form blood cells
  - Chemicals that damage lungs, skin, eyes, or mucous membranes

# List of Hazardous Chemicals Used

- *Provide job-specific list of hazardous chemicals used and their potential physical and/or health hazards.*

# **How to Detect Hazardous Chemical Releases**

- *List ways in which employees can detect hazardous chemical releases. For example:*
  - *Observation*
  - *Smell*
  - *Alarm*

# Personal Protective Equipment (PPE)

- *List ways in which concessioner employees should and/or can protect themselves from hazardous chemical exposure. For example:*
  - *Gloves*
  - *Goggles*
  - *Dust masks*
  - *Respirators (may need to be included in Respiratory Protection Program – 29 CFR 1910.134)*
  - *Pants*
  - *Long-sleeved shirts*

# Labeling System

- Labels must be on all containers holding hazardous chemicals.
- Labels must be created for hazardous chemicals that are not in their original containers. These labels should be:
  - Legible
  - In English (Can supplement with other languages, if needed.)
  - Easily readable.
- Label information should include:
  - The chemical name
  - Hazard information (e.g., harmful if swallowed).

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Note: Labels are not required on portable containers if the hazardous chemical is only for the immediate use of the employee who transfers the hazardous chemical to the portable container.



# Material Safety Data Sheets (MSDSs)

- Must be obtained for all hazardous chemicals in the workplace before they are used.
- Provided by chemical manufacturer or distributor.
- Provide detailed information on each hazardous chemical, including:
  - Potential hazardous effects
  - Physical and chemical characteristics
  - Recommendations for appropriate protective measures.
- Are readily accessible to employees in work areas during work shifts.
- *List and/or identify areas where MSDSs are kept.*

# List of Hazardous Chemicals

- List of all hazardous chemicals used onsite is available to all employees.
- *Explain and show employees where to find the comprehensive hazardous chemical list (e.g., HAZCOM files in administrative office).*

# Documented HAZCOM Program

- Reflects what is specifically being done in the workplace to comply with the HAZCOM Standard.
- Includes the following:
  - List of hazardous chemicals
  - Identification of person/people responsible for complying with the HAZCOM Standard
  - Location of written materials available to employees
  - How concessioner will meet requirements for:
    - Labeling
    - MSDSs
    - Employee information and training
- *Explain and show employees where to find documented HAZCOM Program (e.g., HAZCOM files in administrative office).*



**APPENDIX B**

**HAZCOM TRAINING ATTENDANCE SHEET**

## HAZCOM TRAINING ATTENDANCE SHEET

**Trainer:** \_\_\_\_\_

**Date:** \_\_\_\_\_

Name	Title



**APPENDIX C**

**EMPLOYEE HAZCOM TRAINING  
FOR PERSONNEL FILES**

# EMPLOYEE HAZCOM TRAINING FOR PERSONNEL FILES

Employee Name: \_\_\_\_\_

Hire Date: \_\_\_\_\_

Hazcom Training Type (Initial/Refresher)	Trainer Name and Location	Date